

MORRISON & FOERSTER LLP

250 West 55th Street
New York, New York 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Norman S. Rosenbaum
Jordan A. Wishnew

Counsel for the ResCap Borrower Claims Trust

REED SMITH LLP

Princeton Forrestal Village
136 Main Street, Suite 250
Princeton, New Jersey 08540
Telephone: (609) 987-0050
Facsimile: (609) 951-0824
Diane A. Bettino
Barbara K. Hager, *admitted pro hac vice*

*Co-Counsel for the ResCap Borrower
Claims Trust*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
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**THE RESCAP BORROWER CLAIMS TRUST’S REPLY BRIEF IN SUPPORT
OF ITS MOTION IN LIMINE TO EXCLUDE EVIDENCE CONCERNING
CLAIMANT’S ATTORNEYS’ FEES**

The ResCap Borrower Claims Trust (the “Borrower Trust”) submits this Reply in Support of Its Motion *In Limine* to Exclude Evidence Concerning Claimant Frank J. Reed III (“Claimant” or “Mr. Reed”) Attorneys’ Fees.

To the extent that Mr. Reed agrees that Jeffrey S. Walters, Esq.’s attorneys’ fees, as they relate to the defense of the Matlack Foreclosure Action, are inadmissible, the Borrower Trust’s Motion to exclude evidence of such should be granted.

Dated: September 13, 2016
New York, New York

/s/ Barbara K. Hager

Diane A. Bettino
Barbara K. Hager, *admitted pro hac vice*
REED SMITH LLP
Princeton Forrestal Village
136 Main Street, Suite 250
Princeton, New Jersey 08540
Telephone: (609) 987-0050
Facsimile: (609) 951-0824

Co-Counsel for The ResCap Borrower Claims Trust

-and-

Norman S. Rosenbaum
Jordan A. Wishnew
MORRISON & FOERSTER LLP
250 West 55th Street
New York, New York 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900

Counsel for The ResCap Borrower Claims Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, et al.,

Debtors.

Case No. 12-12020 (MG)

Chapter 11

Jointly Administered

[PROPOSED] ORDER

It is **HEREBY ORDERED** that the ResCap Borrower Claims Trust's Motion *In Limine* To Exclude Evidence Concerning Claimant's Attorneys' Fees Allegedly Incurred in Defense of the Foreclosure Action, is **GRANTED**.

It is **FURTHER ORDERED** that all evidence, testimony, and argument regarding any fees incurred as a result of defending against the Foreclosure Action will be inadmissible at trial.

The Trust's counsel shall serve a copy of this Order on Frank Reed.

IT IS SO ORDERED.

Dated: _____
New York, New York

MARTIN GLENN
United States Bankruptcy Judge

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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-----)	

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day September, 2016, I caused a true and correct copy of the foregoing Motion in Limine to Exclude Evidence Concerning Claimant's Attorneys' Fees Allegedly Incurred in Defense of the Foreclosure Action to be sent to the following parties via Electronic Mail:

Frank Reed
Pro Se Claimant
817 Matlack Drive
Moorestown, NJ 08057
frankreednj@aol.com

/s/ Barbara K. Hager
Barbara K. Hager